

Hammond, Dianne

From: Myers, Sarah Voorhies <myers@chaffe.com>
Sent: Monday, May 17, 2021 1:08 PM
To: Trenton Lacy; Jon Rankin; McIntire, Amy; Hammond, Dianne
Subject: RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

Thanks. As soon as I get a handle on how many emails are included in the production, I'll be in touch regarding a new deposition date.



Sarah Voorhies Myers | Partner

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From: Trenton Lacy <trenton@rosslawgroup.com>
Sent: Monday, May 17, 2021 10:44 AM
To: Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>; Myers, Sarah Voorhies <myers@chaffe.com>
Subject: [EXTERNAL] Re: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

This Message originated outside of Chaffe McCall's system.

Sarah,

I hate to reschedule this deposition once again but I agree the circumstances don't leave for many other options. I would agree to an extension of the expert deadline.

Thanks,
Trenton

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

From: Myers, Sarah Voorhies <myers@chaffe.com>
Sent: Monday, May 17, 2021 10:36:27 AM
To: Trenton Lacy <trenton@rosslawgroup.com>; Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>
Subject: RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

Thanks, Trenton. I agree that it makes the most sense to postpone the deposition in the circumstances, since we will not have a chance to meaningfully review the documents in advance of the Wednesday deposition. But Defendant's current expert report deadline is June 11th. If we reschedule Ms. Soukup's deposition, I'm not sure that will give us time to retain an expert and secure an expert report in advance of the deadline (if we determine that we need an expert after Plaintiff's

deposition). Would you be willing to agree to an additional extension of Defendant's expert report deadline?

Finally, we are happy to supplement our discovery responses if we locate additional responsive documents.

Sarah



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From: Trenton Lacy <trenton@rosslawgroup.com>

Sent: Friday, May 14, 2021 9:25 AM

To: Myers, Sarah Voorhies <myers@chaffe.com>; Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>

Subject: [EXTERNAL] RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

This Message originated outside of Chaffe McCall's system.

Sarah,

I can confirm everything you've said: I do not have any legible copies of those emails, and we would not be using legible copies should we acquire them in the future without prompt supplementation. I would also insist that, should FSS's review of the email file lead to the discovery of information responsive to our discovery requests, that its responses to those requests be supplemented.

As for leaving the deposition open, I would have to draw the line there. If FSS would like additional time to review the emails, we can reschedule once again so y'all can have additional time. Take all the time you need to prepare for her deposition, and once you are adequately prepared, we can get it knocked out. If that can't be done by next week, then let's push it back.

Thanks,

Trenton

From: Myers, Sarah Voorhies <myers@chaffe.com>

Sent: Thursday, May 13, 2021 5:05 PM

To: Trenton Lacy <trenton@rosslawgroup.com>; Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>

Subject: RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

Hi Trenton,

Thanks for your efforts to sort through this. I wanted to wait to respond to your email from yesterday until my IT Department and paralegal were able to download and access the additional information that you provided.

In short, the original document production of bates-numbered documents was 1200 pages – of which approximately 100 were illegible. The new link contains thousands of emails, which we cannot possibly review in advance of Wednesday's deposition. However, we have been able to search through the newly produced link and access almost all of the illegible documents that you originally produced in the bates-numbered responses, with three notable exceptions all of which have the subject "Brynne" (see attached PDF).

Can you please confirm that you cannot provide a legible copy of any of the three attached emails, bates-labeled 00439, 00447, 00448? And can you please further confirm that since you do not have a legible copy, you will not use any of these emails in the future proceedings, unless legible copies are promptly provided to counsel within the pre-trial deadlines and we have the ability to further depose Ms. Soukup regarding these documents? And, finally, can you please confirm that you will not object to our holding open Ms. Soukup's deposition based upon the newly-produced emails, since we cannot possibly review the new emails in advance of Wednesday's deposition? Like you, I suspect and hope that there is nothing relevant or surprising in these emails, and we will have no need to re-depose Ms. Soukup about routine airport operations.

Happy to further discuss by telephone if that's easier.

Thanks,
Sarah



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From: Trenton Lacy <trenton@rosslawgroup.com>

Sent: Wednesday, May 12, 2021 9:45 AM

To: Myers, Sarah Voorhies <myers@chaffe.com>; Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>

Subject: [EXTERNAL] RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

This Message originated outside of Chaffe McCall's system.

Sarah,

It sounds like y'all are having the same trouble as us. Unfortunately, what we sent you was the result of our attempt to access the original production and convert the original files. We put the files through a converter and produced the same result it gave us: you have everything that we have. If your IT people are saying there are more documents in the file, then I've never laid eyes on them and didn't know they existed.

But even if we could open the e-mails, I don't believe it would help to only produce responsive e-mails: each and every email in there would likely be responsive to the requests as written, including "Please produce any and all documents and communications related to Plaintiff's job duties as Regional Director of Operations for FSS" and "Please produce any and all documents and communications related to Plaintiff's job performance."

Ultimately, my understanding is that all of these emails were sent to/from Ms. Soukup using her FSS email account. My understanding is also that FSS cut off her access to that email account. We have already incurred significant time and expense trying to access the emails and have provided FSS with everything that we have. I want to be accommodating,

but it seems to me that FSS has: (1) actively prevented Ms. Soukup from accessing her work emails; (2) greater access to her work e-mails that she does; yet (3) demanded that she nonetheless produce her work emails in its preferred format at her own expense.

Let me know what else we can do to accommodate FSS. If you'd like to serve some interrogatories or requests for admission asking her to affirm that she has no correspondences responsive to FSS's requests other than what she's provided, I'd be happy to respond to that. If FSS has a particular concern in mind (e.g. she used her work email improperly), then let's talk about requests that may be able to address those concerns. Ultimately, I'd like to do what I can to address this because I have no desire to engage in a lengthy discovery battle over what are almost certainly mundane e-mail concerning airport operations.

Thanks,

Trenton N. Lacy
Attorney at Law

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512-474-5306 | Facsimile
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From: Myers, Sarah Voorhies <myers@chaffe.com>
Sent: Tuesday, May 11, 2021 1:55 PM
To: Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>
Cc: Trenton Lacy <trenton@rosslawgroup.com>
Subject: RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

Hi Jon and Trenton,

I wanted to follow up about supplemental document production. My IT Department still is trying to access the documents – but they think it appears to be more than 20,000 emails. As you know, the original production was roughly 1200 pages. Can you please explain the discrepancy?

Is there a way that someone in the Texas office can access the original production and convert the original files – and send to us? Or can you only send the responsive documents to us?

Thanks,
Sarah



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From: Myers, Sarah Voorhies <myers@chaffe.com>

Sent: Monday, May 10, 2021 5:07 PM

To: Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>

Cc: Trenton Lacy <trenton@rosslawgroup.com>

Subject: RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

See attached re-notice of deposition, which we hope can proceed for next Wednesday.

That being said, we still haven't been able to access the documents, but my IT Director advises that the shared folder seems to have more than 21,000 emails. Is this accurate? Plaintiff only produced roughly 1200 pages of documents in its discovery responses.



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From: Jon Rankin <jrankin@rosslawpc.com>

Sent: Monday, May 10, 2021 1:05 PM

To: Myers, Sarah Voorhies <myers@chaffe.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>

Cc: Trenton Lacy <trenton@rosslawgroup.com>

Subject: [EXTERNAL] RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

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Counsel:

I'll try re-sharing the folder. You should receive another email shortly.

Jon D. Rankin

Paralegal

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From: Myers, Sarah Voorhies [<mailto:myers@chaffe.com>]
Sent: Monday, May 10, 2021 1:00 PM
To: Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>
Cc: Trenton Lacy <trenton@rosslawgroup.com>
Subject: RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

We still haven't received the documents. What time did you send, so I can follow up with my IT Department?

We will issue a new notice of deposition for next Wednesday.



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From: Jon Rankin <jrankin@rosslawpc.com>
Sent: Monday, May 10, 2021 12:34 PM
To: Myers, Sarah Voorhies <myers@chaffe.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>
Cc: Trenton Lacy <trenton@rosslawgroup.com>
Subject: [EXTERNAL] RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

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Counsel:

Mr. Lacy and our client are available on Wednesday, May 19, 2021.

Were you able to get the .olm file opened?

Jon D. Rankin

Paralegal

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From: Myers, Sarah Voorhies [<mailto:myers@chaffe.com>]
Sent: Monday, May 10, 2021 12:10 PM
To: Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>
Cc: Trenton Lacy <trenton@rosslawgroup.com>
Subject: RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

Hi Jon,

I still don't have the documents. Once they are received, it will take some time for us to convert the documents – or my paralegal indicates that we may need Ms. Soukup to reload them to a separate link.

At this point, I think we need to discuss alternate dates for the deposition. Please let me know Trenton and Ms. Soukup's availability for next week, particularly next Wednesday, May 19th.

Thanks.



Sarah Voorhies Myers | Partner

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From: Jon Rankin <jrankin@rosslawpc.com>
Sent: Monday, May 10, 2021 10:34 AM
To: McIntire, Amy <mcintire@chaffe.com>; Myers, Sarah Voorhies <myers@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>
Cc: Trenton Lacy <trenton@rosslawgroup.com>
Subject: [EXTERNAL] RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

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Counsel:

I am uploading the raw “.olm” file containing our client’s email communications. It will take a few minutes to finish uploading it because it is so large (5gb). You should be able to download and view it shortly. Please let us know if you are still having issues with the legibility of the emails.

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Paralegal

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From: Jon Rankin
Sent: Friday, May 7, 2021 1:03 PM
To: McIntire, Amy <mcintire@chaffe.com>; Myers, Sarah Voorhies <myers@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>
Cc: Trenton Lacy <trenton@rosslawgroup.com>
Subject: RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

Counsel:

Attached hereto are:

1. Plaintiff First Amended Responses and Objections to Defendant’s First Set of Interrogatories;
2. Plaintiff’s First Supplemental Responses to Defendant’s Request for Production of Documents; and
3. Documents labelled SOUKUP 01185-01192.

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From: McIntire, Amy [<mailto:mcintire@chaffe.com>]

Sent: Monday, May 3, 2021 7:24 PM

To: Trenton Lacy <trenton@rosslawgroup.com>; Myers, Sarah Voorhies <myers@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>

Cc: Jon Rankin <jrankin@rosslawpc.com>

Subject: RE: v. FSS Soukup [CMNO-ChaffeDMS.FID297656]

Hi Trenton,

To follow-up on our discovery teleconference last Friday, we noticed that there may have been some conversion issues with some of the emails produced in the bulk PDF. For one example, SOUKUP00439-442 looks to be emails that were mis-converted during production (perhaps sent from a MAC and opened on a PC?) and are now illegible in the produced PDF. This seems to have happened several times throughout the production. Can you please supplement to produce these emails in a more legible format? I think you had mentioned on the phone about some formatting issues that might be resolved when Plaintiff provides her supplemental responses, so you may already be aware of this, but I wanted to bring to your attention in case not.

Also, just to confirm our teleconference last Friday, I think we reached an amicable agreement on everything outlined in the Rule 37 Letter. For the requests for production generally, Plaintiff agreed to supplement her responses to organize the produced documents by folder/placeholder/etc. and to specify which document(s) are responsive to each request. If Plaintiff has no documents responsive to a specific request, then Plaintiff agreed to state so. For RFP 34, Plaintiff agreed to supplement her response subject to the following modification (or something substantially similar) of the request: “[t]o the extent not already produced in response to the foregoing Requests, please produce any document that you believe supports *the specific factual allegations*

alleged in your Amended Complaint.” For RFP 35, Plaintiff agreed to supplement her response subject to the following modification (or something substantially similar) of the request: “[t]o the extent not already produced in response to the foregoing Requests, please produce any document that you believe supports all or part of *the claims of discrimination and retaliation alleged* in your Amended Complaint.”

For the interrogatories generally, Plaintiff agreed to provide a verification. Plaintiff further agreed to supplement her responses to IROG Nos. 1, 4, and 19 as requested in the Rule 37 Letter. For IROG No. 7, Plaintiff agreed to describe to the best of her recollection the investigation conducted by Frontier and/or to describe the documents that she believes evidence the investigation by Frontier. For IROG No. 13, Plaintiff agreed to supplement her response to qualitatively (and not quantitatively) describe her non-economic damages. For IROG No. 20, Plaintiff agreed to supplement her response to describe the jobs she applied to following the end of her employment with FSS and to provide her work search records from the Texas Workforce Commission when received. For IROG No. 22, no supplemental response is required as Plaintiff has stated in her response that she has no responsive documents in her possession. Given the upcoming deposition, Plaintiff agreed to supplement her responses by 5/7/20. Please let me know if you disagree with any of my above recollection, and I’m also happy to discuss.

Thanks,
Amy



Amy L. McIntire | Partner
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New Orleans, LA 70163
o: 504-585-7030 | f: 504-544-6090

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From: McIntire, Amy
Sent: Friday, April 30, 2021 1:11 PM
To: 'Trenton Lacy' <trenton@rosslawgroup.com>; Myers, Sarah Voorhies <myers@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>
Cc: Jon Rankin <jrankin@rosslawpc.com>
Subject: RE: Soukup v. FSS [CMNO-ChaffeDMS.FID297656]

Hi Trenton,

Sarah had a conflict come up, so I'll be stepping in for her on the call. No problem re: the mix up. If you could call my direct dial (504-585-7030) in about 30 minutes that would be great.

Thanks,
Amy



Amy L. McIntire | Partner
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o: 504-585-7030 | f: 504-544-6090

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From: Trenton Lacy <trenton@rosslawgroup.com>
Sent: Friday, April 30, 2021 1:08 PM
To: Myers, Sarah Voorhies <myers@chaffe.com>; Hammond, Dianne <hammond@chaffe.com>
Cc: Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>
Subject: [EXTERNAL] RE: Soukup v. FSS [CMNO-ChaffeDMS.FID297656]

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Sarah,

My apologies, it sounds like there was a scheduling mixup that was 100% the fault of my office. If you'd be available, I can meet with you here in about 30 minutes, but if that doesn't work then I'd be happy to make myself available at your earliest convenience. Again, I apologize.

Thanks,
Trenton

From: Myers, Sarah Voorhies <myers@chaffe.com>
Sent: Monday, April 26, 2021 4:12 PM
To: Trenton Lacy <trenton@rosslawgroup.com>; Hammond, Dianne <hammond@chaffe.com>
Cc: Jon Rankin <jrankin@rosslawpc.com>; McIntire, Amy <mcintire@chaffe.com>
Subject: RE: Soukup v. FSS [CMNO-ChaffeDMS.FID297656]

Thanks, Trenton. No problem at all to reschedule; I just wanted to get the conversation started. Let's plan to talk on Friday afternoon at 1:00 p.m.

Sarah



Sarah Voorhies Myers | Partner

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From: Trenton Lacy <trenton@rosslawgroup.com>
Sent: Monday, April 26, 2021 3:47 PM
To: Hammond, Dianne <hammond@chaffe.com>
Cc: Myers, Sarah Voorhies <myers@chaffe.com>; Jon Rankin <jrankin@rosslawpc.com>
Subject: [EXTERNAL] RE: Soukup v. FSS

This Message originated outside of Chaffe McCall's system.

Sarah,

Thank you for reaching out. I'd be happy to meet and confer about our discovery responses, and I'm willing to supplement where appropriate, but you've notified me of this dispute a mere 48 hours before the arbitrary date and time of a discovery conference that you've apparently scheduled with me--without my input. I'm currently preparing for a mediation on a separate case, scheduled for tomorrow, and I'm unlikely to have time to consider this request for supplementation until Wednesday morning at the earliest.

If you'd be amenable, I'm available pretty much any time Thursday (April 29th) or Friday (April 30th) after 12:00 PM CST, and I'd be happy to discuss this with you any time those afternoons. If that doesn't work for you, I can see about doing something this weekend or early next week.

Thanks,

Trenton N. Lacy
Attorney at Law

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From: Hammond, Dianne <hammond@chaffe.com>
Sent: Monday, April 26, 2021 3:20 PM
To: Trenton Lacy <trenton@rosslawgroup.com>
Cc: Myers, Sarah Voorhies <myers@chaffe.com>
Subject: Soukup v. FSS

Please see the attached.



Dianne M Hammond | Legal Secretary
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